

EXHIBIT 2



Allauna Gluski <allauna@lloydmousilli.com>

ATTORNEYS EYES ONLY - Hough v. Carroll - Partial Social Security Number Disclosure

2 messages

Megan Weiss <megan@lloydmousilli.com>

Fri, May 17, 2024 at 1:07 PM

To: Nico Banks <nico@bankslawoffice.com>, richard@nerviglaw.com

Cc: William Shibley <william@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

Counsel,

Please see below for the last four digits of the listed individuals' social security numbers:

Max O. Day - [REDACTED]

Max K. Day - [REDACTED]

Ryan Carroll - [REDACTED]

Thank you,

Megan Weiss, Head of Operations

Lloyd & Mousilli - Attorneys & Counselors at Law

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Nico Banks <nico@bankslawoffice.com>

Fri, May 17, 2024 at 1:53 PM

To: Megan Weiss <megan@lloydmousilli.com>

Cc: richard@nerviglaw.com, William Shibley <william@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>

Below is a consolidated discovery deficiencies, which are the same as what's in the emails. Also below are proposed sanctions. I will talk to you soon.

Steps to cure tax return production deficiencies:

1. Confirm in writing that the tax returns you've produced are the same as the ones filed with the IRS, with the exception of the signatures, and that there are no other tax returns that the Jurisdictional Defendants have filed with the IRS for 2021 or later.
2. Produce Michael Day's 2022 tax return
3. Eliminate all redactions on all tax returns except the redactions allowed by the federal rules or protective order (e.g., you can redact all but the last four digits of social security numbers and EIN numbers).

Steps to cure asset-disclosure deficiencies:

1. Produce the responses in excel form instead of PDF form because the PDFs cut off important text.
2. Ensure that each disclosure includes all the information required by the orders, such as the name of the bank, the account number, the peak value of the asset since May of 2022, and the current value of the asset.
3. Identify WWKB's assets and any other assets subject to the asset-disclosure order or interrogatory that have not yet been disclosed.

Proposed Sanctions:

1. Defendants' attorneys should be required to pay \$2,000 per day for each violation of the orders since the date compliance was ordered.

2. Defendants' attorneys should be required to pay Plaintiffs' attorneys' fees for efforts to bring Defendants into compliance with the orders.

3. Defendants should be incarcerated until they have substantially complied with the orders.

Regards,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

Unit #8571,

Washington, DC 20002

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